

Iowa Department of Natural Resources

Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (DNR) finds that:

1. NuStar Pipeline Operating Partnership L.P.- Le Mars Terminal, located at 33035 C12, Le Mars, IA 51031 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Bill Fogarty.
2. NuStar Pipeline Operating Partnership L.P.- Le Mars Terminal is a Refined Petroleum Pipeline (SIC 4613) and Transportation Services (SIC 4789) facility. This facility consists of 8 emission units with potential emissions of:

| Pollutant | Abbreviation | Potential Emissions (Tons per Year) |
|---|-------------------|--|
| Particulate Matter ($\leq 2.5 \mu\text{m}$) | PM _{2.5} | 0.0 |
| Particulate Matter ($\leq 10 \mu\text{m}$) | PM ₁₀ | 0.0 |
| Particulate Matter | PM | 0.0 |
| Sulfur Dioxide | SO ₂ | 0.0 |
| Nitrogen Oxides | NO _x | 0.0 |
| Volatile Organic Compounds | VOC | 248.52 |
| Carbon Monoxide | CO | 0.0 |
| Lead | Lead | 0.0 |
| Hazardous Air Pollutants ⁽¹⁾ | HAP | 3.11 |

⁽¹⁾ May include the following: 2,2,4-Trimethylpetane, Benzene, Cumene, Ethylbenzene, Toluene, Xylene (mixed isomers) and Hexane.

3. NuStar Pipeline Operating Partnership L.P.- Le Mars Terminal submitted a Title V Operating Permit renewal application on 6/10/2021. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.
4. DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from May 12th through June 11th, 2022. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period. During this time, anyone may submit written comments on the permit. Mail signed comments to Taylor Dailey at the DNR address shown below.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Taylor Dailey at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-35.
4. DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

Title V Permit Review Notes

| | |
|------------|--|
| Applicant: | NuStar Pipeline Operating Partnership L.P. – Le Mars Terminal |
| SIC Code: | 4613 (Refined Petroleum Pipeline), 4789 (Transportation Services, nec) |
| City: | Le Mars |
| County: | Plymouth (Field Office 3) |
| EIQ#: | 92-2944 |
| Facility#: | 75-01-018 |
| Permit #: | 00-TV-011R4 |
| Reviewer: | Taylor Dailey |
| Date: | 5/10/2022 |

Facility Identification

| | |
|-----------------------|---|
| Facility Name: | NuStar Pipeline Operating Partnership L.P. – Le Mars Terminal |
| Facility Location: | 33035 C12, Le Mars, Iowa 51031 |
| Responsible Official: | Bill Fogarty |
| Phone: | (316) 721-7066 |

Background:

NuStar Pipeline Operating Partnership L.P. – Le Mars Terminal has applied to renew their Part 70 Title V Operating Permit. The facility consists of eight significant emission points and eleven insignificant units. This is the fourth Title V renewal for NuStar Pipeline Operating Partnership L.P. – Le Mars Terminal.

Regulatory Status:

Title V Major Source Status by Pollutant

| Pollutant | Major for Title V? |
|------------------|-------------------------------------|
| PM ₁₀ | <input type="checkbox"/> |
| SO ₂ | <input type="checkbox"/> |
| NO _x | <input type="checkbox"/> |
| VOC | <input checked="" type="checkbox"/> |
| CO | <input type="checkbox"/> |
| Lead | <input type="checkbox"/> |
| Individual HAP | <input type="checkbox"/> |
| Total HAPs | <input type="checkbox"/> |

The following amendments have been made to the Title V Permit:

1. TV Permit number has been updated.
2. Permit Contact for the application has been updated.

3. Insignificant Equipment list
 - Updated to include storage capacities and physical descriptions of the tanks.
 - A footnote has been added to units EU-02, EU-06, EU-08, EU-09, and EU-12. *These tanks are not used to store gasoline. If they are used to store gasoline, they will be subject to NESHAP - 40 CFR 63 subpart BBBBBB and become significant emission units.*
 - A Footnote has been added to EU-18. *System consist of an air stripper, controlled by a carbon adsorption canister (CE-01).*
4. Tanks EP-01, EP-04, EP-10, and EP-11 have been updated with updated wording for 40 CFR 63 Subpart BBBBBB.
5. Plant Wide Conditions and General Requirements have been updated to the most recent versions.
6. Updated that EP's 5, 7, 10, and 11 have control equipment.
7. Added Construction Permit 20-A-093 to EP-07. Updated Operating Limits and Requirements section to match.
8. The previous permit contained requirements form 40 CFR 63 Subpart R. This facility is considered to be an area source of HAP's based on the PTE so it is not subject to Subpart R as this subpart only applies to major HAP sources. All references to Subpart R have been removed from the permit.

Construction Permits:

The description of emission units and their construction permits are listed in Table 2.

Table 2. List of construction permit of each unit

| Emission Point Number | Emission Unit Number | Emission Unit Description | DNR Construction Permit Number |
|------------------------------|-----------------------------|-----------------------------------|---------------------------------------|
| EP-01 | EU-01 | Gasoline Loading Rack | Grandfathered |
| | | Distillate Loading Rack | Grandfathered |
| | | Ethanol Loading Rack | Grandfathered |
| EP-03 | EU-03 | Fixed Roof Tank | 98-A-651-S1 |
| EP-04 | EU-04 | Fixed Roof Tank | Grandfathered |
| EP-05 | EU-05 | Internal Floating Roof Tank 10-22 | Grandfathered |
| EP-07 | EU-07 | Internal Floating Roof Tank 10-24 | 20-A-093 |
| EP-10 | EU-10 | Internal Floating Roof Tank 15-21 | Grandfathered |
| EP-11 | EU-11 | Internal Floating Roof Tank 15-22 | Grandfathered |
| EP-13 | EU-13 | Equipment Leaks | NA |

Program Applicability:

Emission Limits and conditions:

1. The facility is a major source of VOC and an area source for HAPs.
2. NSPS Subpart XX does not apply to the loading rack (EU-01) because of the construction date.
3. NSPS Subpart Ka –Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, does not apply to EU-03. Construction permit 98-A-651-S1 requires that this storage tank shall not store any petroleum liquid.
4. NESHAP: 40 CFR 63 Subpart BBBBBB – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bilk Terminals, Bulk Plants, and Pipeline Facilities.
 - a. The affected units are gasoline storage tanks (EP-04, EP-10 and EP-11), and the loading rack (EP-01).
 - b. EP-05 and EP-03 are not subject because these units do not store gasoline.
 - c. The facility meets the definition of an existing affected source under Subpart BBBBBB
5. PSD does not apply: The facility is not defined by any of the 28 source categories and the PTE is less than 250 tpy.
6. NAAQS does not apply: Facility is located in an attainment area.
7. Title IV and Stratospheric Ozone regulations do not apply to this facility.

Emission Estimates:

Potential Emissions:

| Pollutant | Potential Emissions (Tons per Year) |
|---|--|
| Particulate Matter ($\leq 2.5 \mu\text{m}$) | 0 |
| Particulate Matter ($\leq 10 \mu\text{m}$) | 0 |
| Particulate Matter | 0 |
| Sulfur Dioxide | 0 |
| Nitrogen Oxides | 0 |
| Volatile Organic Compounds | 248.52 |
| Carbon Monoxide | 0 |
| Lead | 0 |
| Hazardous Air Pollutants ⁽¹⁾ | 3.11 |

- ⁽¹⁾ May include the following: 2,2,4-Trimethylpetane, Benzene, Cumene, Ethylbenzene, Toluene, Hexane, and Xylene (mixed isomers).

Facility reported Potential Emissions as follows:

1. Maximum throughput was assumed while calculating emissions.
2. HAP emissions and VOC emissions for the Tanks (EP-3, EP-04; EP-05, EP-07, EP-10, EP-11) were estimated using the Tank 4.0 program.
3. VOC emissions from the loading racks were based on the AP-42 Loading Loss Calculation (AP-42: 5.2 Transportation And Marketing of Petroleum Liquids) and were calculated using the TANK 4.0 program.
4. HAP emissions from the loading racks were based on the vapor percentage (by weight) in the total VOC (AP-42: 7.1.4 Hazardous Air Pollutants (HAP) Speciation Methodology) and were calculated using the TANK 4.0 program.
5. Fugitive Emissions were estimated using the following:
 - i. U.S. EPA, February, 1995. New Equipment Leak Emission Factors of Petroleum Refineries, Gasoline Marketing, and Oil & Gas Production Operations.
 - ii. American Petroleum Institute, 1993 Development of Fugitive Emission Factors and Emission Profiles for Petroleum Marketing Terminals. Volume 1 & Volume 2

General Conditions:

Plant-Wide Emission Limits:

1. The total throughput of gasoline for the loading rack is limited to less than 250,000 gallon/day. The total throughput of distillate for the loading rack is limited to 93,300,000 gallon/yr.
2. This facility shall maintain monthly records of the material and quantity loaded through the loading rack on a 12-month rolling basis.
3. The record shall be retained for five years.

Stack Testing:

1. The periodic monitoring evaluation using the Iowa DNR's Periodic Monitoring Guidance indicates a VOC stack tests is required for Emission Point (EP-01). Because there are no short term, hourly, limits for this emission point. Stack testing is not required for EP-01.

Compliance Status:

1. The facility is in compliance.

=====END OF NOTES=====